

REMARKS

We are in receipt of the Office Action dated January 11, 2005, and the above amendments and following remarks are made in light thereof.

First, the Examiner asserts that the title of the invention is not descriptive. In response, the title has been amended to "Semiconductor Device Having A Storage Capacitor."

Secondly, claims 57, 63, 69, 75, 81 and 87 are objected to because of the informalities and/or defects. In response, these claims have been amended as shown above.

Thirdly, claims 57-92 are rejected under 35 U.S.C. 103(a) as being unpatentable over Yamazaki et al. (U.S. Patent No. 6,274,887) in view of Smolko (U.S. Patent No. 3,895,272) and/or Rho et al. (U.S. Patent No. 6,057,896). Applicant respectfully traverses this rejection because the Examiner has not made a *prima facie* case of obviousness.

In establishing a *prima facie* case of obviousness, three basic criteria must be met. As one of the basic criteria, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Obviousness can only be established by combining or modifying the teaching of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art.

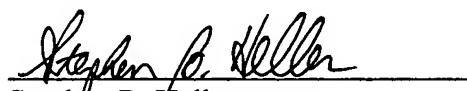
In the Office Action, the Examiner contends that at least a portion of the storage capacitor is naturally formed with a portion of the drain wiring 4136 and/or 4135 and a portion of the substrate with the base insulating film therebetween. Yamazaki et al. teaches that the storage capacitor 4104 is formed by the drain wiring 4140 of the current control TFT 4103 and the wiring 4136 which is electrically connected to the drain wiring of the switching TFT 4102 (See col.32, lines 6-14). Even if the Examiner is correct that the storage capacitor is inherently

formed by the portion of the drain wiring and the portion of the substrate, such a storage capacitor is not intentional and Yamazaki et al. would not positively use such an unintentional storage capacitor for its circuit. Rather, the storage capacitor is already formed by the drain wiring 4140 and the wiring 4136, as described above. Consequently, one of ordinary skill in the art would not be motivated to remove a portion of the interlayer insulating film so as to expose a portion of the base insulating film in order to increase the capacitance, because Yamazaki et al. does not teach or suggest using such a storage capacitor.

Therefore, there is insufficient motivation or suggestion for combining Yamazaki et al. and Smolko and/or Rho et al., and that the amended claims 57-92 are patentable over these references.

Based on the foregoing, Applicant respectfully submits that the application is now in condition for allowance, and an early Office Action in this regard is earnestly solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stephen B. Heller", is written over a horizontal line.

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